

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION
d/b/a/ SHAREHOLDER.COM,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON
CORPORATION, ROBERT I. ADLER, JOHN
DOES 1 THROUGH 5, and JANE DOES 1
THROUGH 5,

Defendants.

Civil Action No. 04-10535-PBS

**DEFENDANTS CCBN.COM AND THE THOMSON CORPORATION'S
MOTION TO IMPOUND THEIR RESPONSE TO PLAINTIFF
SHAREHOLDER.COM'S OPPOSITION TO
DEFENDANT ADLER'S MOTION FOR A PROTECTIVE ORDER**

Defendants CCBN.com, Inc. ("CCBN") and The Thomson Corporation (collectively, "CCBN") submit this Assented-To Motion to Impound CCBN's Response to Plaintiff Shareholder.com's Opposition to Defendant Adler's Motion for a Protective Order (the "Response").

Impoundment is necessary because the Response contains references to, and attaches copies of, documents produced by defendants that have been designated as "Confidential" under the terms of the Stipulated Protective Order (attached as Exhibit A).

Respectfully submitted,

CCBN.COM, INC. and THE THOMSON
CORPORATION,

By its attorneys,

/s/ David M. Moss
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DATED: June 15, 2005

LOCAL RULE 7.1A(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for CCBN conferred with counsel for plaintiff and for Mr. Adler in a good faith effort. Counsel for Mr. Adler assents to the motion, but counsel for plaintiff does not assent to the motion.

/s/ David M. Moss

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